

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**IN RE: STEEL ANTITRUST  
LITIGATION**

**Case No. 08-cv-5214**

**Honorable James B. Zagel**

**THIS DOCUMENT RELATES TO  
ALL DIRECT PURCHASER ACTIONS:**

*Standard Iron Works v. ArcelorMittal, et al.,*  
Case No. 08-cv-5214

*Wilmington Steel Processing Co., Inc. v.*  
*ArcelorMittal, et al.,* Case No. 08-cv-5371

*Capow, Inc. d/b/a Eastern States Steel v.*  
*ArcelorMittal, et al.,* Case No. 08-cv-5633

*Alco Industries, Inc. v. ArcelorMittal, et al.,*  
Case No. 08-cv-6197

*Gulf Stream Builders Supply, Inc. v.*  
*ArcelorMittal et al.,* Case No. 10-cv-4236

**PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL  
OF SETTLEMENT WITH ARCELORMITTAL S.A. AND  
ARCELORMITTAL USA LLC, CONDITIONAL CERTIFICATION  
OF A SETTLEMENT CLASS, AND APPROVAL OF NOTICE,  
SUMMARY NOTICE AND NOTICE PLAN**

Pursuant to Federal Rules of Civil Procedure 23(a), 23(b)(3) and 23(e), Plaintiffs  
respectfully move this Court to:

1. Grant preliminary approval to the proposed settlement with ArcelorMittal S.A. and  
ArcelorMittal USA LLC;
2. Conditionally certify for settlement purposes the proposed Settlement Class;

3. Conditionally appoint Named Plaintiffs as Class Representatives, and appoint Fine, Kaplan and Black, RPC, and Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C. as Co-Lead Class Counsel;

4. Approve the form and manner of giving notice of the proposed settlement to the Class; and

5. Set a date for a hearing on final approval of the settlement.

Plaintiffs have submitted a [Proposed] Preliminary Approval Order which is consistent with the relief requested herein.

Dated: June 6, 2014

Respectfully submitted,

Michael K. Kellogg  
Mark C. Hansen  
Michael J. Guzman  
Steven F. Benz  
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/s/ Jeffrey S. Istvan  
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*Interim Co-Lead Counsel for Plaintiffs and the Proposed Class*

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*Liaison Counsel for Plaintiffs and the Proposed Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 6th day of June, 2014, I caused a true and correct copy of the foregoing **PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT WITH ARCELORMITTAL S.A. AND ARCELORMITTAL USA LLC, CONDITIONAL CERTIFICATION OF A SETTLEMENT CLASS, AND APPROVAL OF NOTICE, SUMMARY NOTICE AND NOTICE PLAN** to be filed and served electronically via the Court's CM/ECF system upon all registered users.

/s/ Jeffrey S. Istvan  
Jeffrey S. Istvan